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Attorneys for Defendant Greyhound Lines, Inc.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
SOUTHERN DIVISION

MARY MORRISETT, Plaintiff, vs. GREYHOUND LINES, INC, and JOHN DOES I-XX, Defendants.	NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH Civil No.: _____ Judge _____
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Defendant Greyhound Lines, Inc. (“Greyhound”), by and through its undersigned counsel, hereby files this Notice of Removal of Case No. 220700001 filed in the Seventh Judicial District Court in and for Emery County, State of Utah and styled *Mary Morrisett v. Greyhound Lines, Inc., and John Does I-XX* (the “Civil Action”) and further states:

1. On January 3, 2022, Plaintiff commenced the Civil Action in the Seventh District Court in and for Emery County, State of Utah, by filing of a Complaint.
2. Greyhound Lines, Inc. (“Greyhound”) first received a copy of the Complaint on January 4, 2022.

3. The Complaint alleges, among other things, that Plaintiff Mary Morrisett is a resident of White County, Georgia.

4. Defendant Greyhound is now and was at the time of the commencement of this action a foreign corporation that has its corporate offices and principal place of business in Dallas, Texas. While Greyhound has an office in Utah, Greyhound is not incorporated in, nor does it have a principal place of business in, Utah.

5. Based upon the reasonably diligent search conducted by undersigned counsel, Greyhound submits, upon information and belief, that there is now, and was at the time the defendant received a copy of the Complaint, complete diversity of citizenship between the parties.

6. The Civil Action is one over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332 and is one that may be removed to this Court pursuant to 28 U.S.C. § 1441(b).

7. The Complaint asserts the matter in controversy exceeds \$300,000.00 exclusive of interest and costs.

8. This Notice of Removal is filed within thirty (30) days after the defendant received a copy of the Complaint with was the first paper from which it could be ascertained that the case is one which is removable.

9. Written notice of the filing of the Notice of Removal will be given to all adverse parties as required by 28 U.S.C. § 1446(d).

10. A true and correct copy of this Notice of Removal will be filed with the Clerk of the Seventh District Court, Emery County, State of Utah, as provided by 28 U.S.C. § 1446(d).

11. Defendant Greyhound reserves all rights and defenses and waives none by virtue of this removal.

12. Pursuant to 28 U.S.C. § 1446(a), attached hereto collectively as **Exhibit A** is a copy of all known process, pleadings, and orders filed in the state court action.

13. Greyhound has complied with all the requirements of 28 U.S.C. § 1446.

14. A copy of the “Notice of Filing Notice of Removal,” which is being filed in the State Court Action, is attached hereto as **Exhibit B**.

DATED this 12th day of January 2022.

CHRISTENSEN & JENSEN, P.C.

/s/Stephen D. Kelson

Stephen D. Kelson

Attorneys for Defendant Greyhound Lines, Inc

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SOUTHERN DIVISION

MARY MORRISETT,

Plaintiff,

vs.

GREYHOUND LINES, INC, and JOHN
DOES 1-XX,

Defendants.

**CERTIFICATE OF SERVICE FOR
NOTICE OF REMOVAL TO
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

Civil No.: _____
Judge _____

I hereby certify that on the 12th day of January 2022, a true and correct copy of the foregoing **NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH** was served via email to the following:

Kurt B. London CRAIG SWAPP & ASSOCIATES 9980 South 300 West, #400 Sandy, UT 84070 kurt.london@craigswapp.com <i>Attorney for Plaintiff</i>	Matthew J. Grossman – pro hac vice anticipated 10 West Adams Street Jacksonville, FL 32202 mgrossman@farahandfaraha.com <i>Attorney for Plaintiff</i>
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CHRISTENSEN & JENSEN, P.C.

/s/Stephen D. Kelson
Stephen D. Kelson
Attorneys for Defendant Greyhound Lines, Inc.

Index of Exhibits

Exhibit A Copy of all known process, pleadings, and orders filed in the state court action

Exhibit B Notice of Filing Notice of Removal